

EXHIBIT 21

In The Matter Of:

*Fair Fight Action v.
Raffensperger*

*Adrienne Jones
December 19, 2019*

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1 inappropriate, yes. This is an opinion editorial
2 which I am expressing my opinion loudly and
3 flamboyantly, as it were. And, yes, I think
4 inappropriate things happened during the election
5 caused by the Secretary of State.

6 BY MR. MILLER:

7 Q Do you believe that the state of Georgia
8 engaged in intentional voter disenfranchisement in
9 the 2018 gubernatorial election?

10 A Yes.

11 Q And would that be what you're referring to
12 with your multiprong suppression attack reference in
13 that Georgia Can Runoff article?

14 A Yes.

15 Q In some of the examples you provided -- in
16 that next paragraph there, you state: Kemp's office
17 rejected absentee ballots, refused to ensure that
18 there were enough voting machines, power cords and
19 provisional ballots, and he enacted an exact match
20 law which rejected ballots if the voters' names on
21 their identification did not exactly match on the
22 voter rolls.

23 Do you see that?

24 A Yes.

25 Q Do you know who the responsibility for

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1 Q You go on to state: State and federal
2 governments today are working to make sure that
3 large slots of people, in this case democrats, are
4 unable to vote or overlooked politically.

5 Right?

6 A Yes.

7 Q Do you believe that the federal government
8 is engaging in voter suppression?

9 A I'm going to say yes. But, I mean -- I
10 mean, states control voting, but -- I'm just going
11 to say yes.

12 Q And do you believe that to be tantamount
13 to slavery, or is the title here just entirely
14 misleading?

15 A The title is provocative. My point is
16 that once large slots of people are disenfranchised,
17 terrible things have and will happen, or could
18 potentially happen.

19 Q I'll hand you another article which we'll
20 mark as Exhibit 7.

21 (Jones Deposition Exhibit [D-7](#) was marked
22 for identification and attached to the transcript.)

23 BY MR. MILLER:

24 Q Do you recall writing this article?

25 A Not off the top of my head.

1 position in the DDS, but if the -- but since voting
2 is a state function, I was under the impression that
3 the Secretary of State had some knowledge of -- and
4 some responsibility for voters who are automatically
5 or intentionally registered at the DMV.

6 Q Back to the original question about is it
7 your concern -- are you implying that the Secretary
8 had some knowledge or was otherwise involved in an
9 intentional discrimination against Puerto Rican
10 citizens based on DDS's actions?

11 A I'm going to say yes, because these are
12 people in the state registering to vote through the
13 DMV. And therefore -- and people of color -- and
14 so, yes. They're related to registration of people
15 to vote in the state.

16 Q But you have no citation for that
17 obligation; right?

18 A I have the statement that the State has a
19 long history of voter suppression and here is an
20 example of voters -- potential voters of color
21 having difficulty registering to vote.

22 Q Page 11, you talk about Randolph County
23 closing precinct locations; right?

24 A Yes.

25 Q And in that second paragraph there, you

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1 state: Before the 2018 midterm elections, the
2 Randolph County Board of Elections voted three to
3 nothing to close seven majority black primary
4 runoffs. After a public outcry, the board backed
5 down.

6 Right?

7 A Yes.

8 Q So you acknowledge there that the local
9 Board of Elections was the one that voted to close
10 any precincts; right?

11 A Yes.

12 Q And so you understand that local election
13 officials are responsible for closing, moving, or
14 otherwise changing precinct locations under Georgia
15 law?

16 MR. DUBOSE: Objection.

17 A I do, I also know that the Secretary of
18 State is provided information to locals about when
19 and how to do that.

20 BY MR. DUBOSE:

21 Q I'm sorry. Can you -- the Secretary of
22 State?

23 A The Secretary of State has issued
24 information to -- since Shelby, about closures to
25 assist local jurisdictions in determining --